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December 28, 2021

VIA ECF

Hon. Roanne L. Mann
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Rothschild v. General Motors LLC* No. 19-cv-5240-DLI-RM Joint Motion to Hold Case Deadlines in Abeyance Pending Finalization of Settlement

Dear Magistrate Judge Mann:

Plaintiff Mark Rothschild and Defendant General Motors LLC (collectively, “the Parties”) hereby file this Joint Motion to Hold Case Deadlines in Abeyance Pending Finalization of Settlement, respectfully showing the Court as follows:

1. On November 8, 2021, the Parties notified the Court that they reached an agreement in principle to resolve this matter on an individual basis and are in the process of negotiating a settlement agreement. The parties requested 30 days to complete that process and file a stipulation of dismissal of the plaintiff’s case.
2. On December 8, 2021, the Parties requested that the Court enter an Order holding all case deadlines in abeyance for an additional 14 days to finalize the resolution of this matter.
3. Due to delays associated with the holidays, the Parties have been unable to finalize the settlement within the requested time, and therefore respectfully request that the Court enter an Order holding all case deadlines in abeyance for an additional 7 days to conserve the Parties’ and Court’s resources while they finalize the resolution of this matter.

WHEREFORE, based on the foregoing, the parties respectfully request that the Court enter an Order holding all case deadlines in abeyance for 7 days pending finalization of the Parties' settlement.

Respectfully submitted,

/s/ Mark Patronella

/s/ Adam Reinke

Mark Patronella

Counsel for Plaintiff Mark Rothschild

Adam Reinke

Counsel for Defendant General Motors LLC

cc: All Counsel of Record (via ECF)